

DOLORES Y. LEAL (134176)
OLIVIA FLECHSIG (334880)
ALLRED, MAROKO & GOLDBERG
6300 Wilshire Blvd. Suite 1500
Los Angeles, CA 90048-5217
(323) 653-6530
dleal@amglaw.com
oflechsig@amglaw.com

Attorneys for Plaintiff MARK SNOOKAL

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,

Plaintiff,

vs.

CHEVRON USA, INC., a California
Corporation, and DOES 1 through 10,
inclusive,

Defendants.

) CASE NO.: 2:23-cv-6302-HDV-AJR

)

)

) **DECLARATION OF OLIVIA FLECHSIG**
) **IN SUPPORT OF PLAINTIFF MARK**
) **SNOOKAL'S MOTION IN LIMINE NO. 1**
) **– DAUBERT MOTION TO EXCLUDE**
) **THE PURPORTED EXPERT OPINION**
) **TESTIMONY OF DR. VICTOR**
) **ADEYEYE**

)

) *[Filed concurrently with Plaintiff's Notice of*
) *Motion and Motion in Limine No. 1 – Daubert*
) *Motion to Exclude the Purported Expert*
) *Opinion Testimony of Dr. Victor Adeyeye and*
) *[Proposed] Order Granting Plaintiff's Motion*
) *in Limine No. 1]*

)

) District Judge: Hon. Hernan D. Vera
) Magistrate Judge: Hon. A. Joel Richlin
) Action Filed: August 3, 2023
) Trial Date: August 19, 2025

)

) Hearing Date: July 24, 2025
) Hearing Time: 10:00 a.m.
) Courtroom: 5B

)

)

DECLARATION OF OLIVIA FLECHSIG

I, Olivia Flechsig, declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am an associate with the law firm Allred, Maroko & Goldberg, counsel of record for Plaintiff Mark Snookal. As such, I have personal knowledge of the facts set forth below and, if called as a witness, could and would testify competently to such facts under oath.

2. I make this declaration in support of Plaintiff's Motion in Limine No. 1 – Daubert Motion to Exclude the Purported Expert Opinion Testimony of Dr. Victor Adeyeye.

3. On November 8, 2024, Defendant Chevron USA, Inc. ("Defendant") served its Second Amended Expert Witness Disclosures. In same, Defendant wrote the following disclosure regarding Dr. Victor Adeyeye, a non-retained expert witness:

"Cardiologist at Warri Medical Clinic (contact through Defendant's counsel). Dr. Adeyeye may offer testimony at trial regarding his review of medical records or other documents, communications between and among Dr. Adeyeye and other health care professionals concerning Plaintiff Mark Snookal and Plaintiff's medical history, health condition, and fitness to be medically cleared for the role of the REM position in Escravos, Nigeria in 2019."

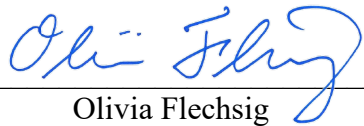
4. I took the first volume of the deposition of Dr. Victor Adeyeye on November 15, 2024, and I am in possession of a certified copy of his deposition transcript. Attached hereto as **Exhibit 1** is a true and correct copy of relevant excerpts from Dr. Adeyeye's Volume I deposition transcript.

5. I took the second volume of the deposition of Dr. Victor Adeyeye on April 22, 2025, and I am in possession of a certified copy of his deposition transcript. Attached hereto as **Exhibit 2** is a true and correct copy of relevant excerpts from Dr. Adeyeye's Volume II deposition transcript.

6. On June 17, 2025, Dolores Y. Leal and I met and conferred with counsel for Defendant, Tracey Kennedy and Robert Mussig, via Zoom videoconference regarding the topics required by Local Rule 16-2, including Plaintiff's anticipated Motions in Limine. Further to this

1 call, on June 18, 2025, I sent a meet and confer email to Ms. Kennedy and Mr. Mussig to further
2 meet and confer.

3
4 I declare under penalty of perjury under the laws of the State of California
5 that the foregoing is true and correct, and that this Declaration was executed on July 1, 2025, at
6 Los Angeles, California.

7
8 
9 Olivia Flechsig